

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
vs.	)	No. 19-04031-01-CR-C-BCW
	)	
WESLEY BRIAN KASTER,	)	
	)	
Defendant.	)	

**SENTENCING MEMO**

Comes now defendant, Wesley Brian Kaster, by counsel Troy K. Stabenow, and joins the government in recommending a sentence of 60 months' confinement.

**SUGGESTIONS IN SUPPORT**

1. Mr. Kaster is forty-three years old. He is a dedicated father of four (see e.g. Exhibit 1), the husband of a disabled spouse, and the sole provider for his family.<sup>1</sup> He voluntarily served our country in the Armed Forces for eight years.<sup>2</sup> He has no criminal history.<sup>3</sup> He earned a Bachelor's Degree in Applied Science<sup>4</sup> and was a supervisor at his job until he committed this offense.<sup>5</sup>

2. Guideline 2K1.4 would recommend a sentence of 37 to 46 months given

---

<sup>1</sup> PSIR at Paragraphs 38-44.

<sup>2</sup> Id. at 60.

<sup>3</sup> Id at 32, 38-44.

<sup>4</sup> Id. at 54.

<sup>5</sup> Id. at 57.

the characteristics of this first-time offense. However, the mandatory minimum requires a higher sentence, of at least 60 months' confinement.

3. In light of Mr. Kaster's lack of criminal history, and the fact that the mandatory minimum is above the Guideline Range, the parties have agreed that a sentence of 60 months' total confinement is sufficient but not greater than necessary to encompass all the factors described in 18 U.S.C. § 3553(A).

4. Counsel is not aware of any issues requiring argument or resolution.

WHEREFORE, defendant, Wesley Brian Kaster, respectfully requests this Court to impose a total sentence of 60 months' confinement and one year of supervised release.

Respectfully submitted,

/s/ Troy K. Stabenow

**TROY K. STABENOW**, # 57067

Assistant Federal Public Defender

80 Lafayette Street, Suite 1100

Jefferson City, Missouri 65101

(573) 636-8747

Attorney for Defendant

July 4, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of July, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent e-mail notification of such filing to all CM/ECF participants in this case, and a copy was mailed, via the United States Postal Service, to all non-CM/ECF participants.

/s/ Troy K. Stabenow

**TROY K. STABENOW**